



# CITY OF SANTA BARBARA

## COUNCIL AGENDA REPORT

**AGENDA DATE:** July 20, 2010

**TO:** Mayor and Councilmembers

**FROM:** Planning Division, Community Development Department

**SUBJECT:** Program Environmental Impact Report (EIR) for the *Plan Santa Barbara* General Plan Update

### RECOMMENDATION:

That Council hold a work session on the Program Environmental Impact Report (EIR) for the *Plan Santa Barbara* General Plan Update, including presentations by staff of the City Attorney's Office and Planning Division.

### DISCUSSION:

The current step in the *Plan Santa Barbara* process is Council direction to staff for preparing the final General Plan Update and EIR documents for subsequent City approval actions. On June 23, 2010, Council requested additional work sessions to review component draft documents and ensure Council understanding prior to giving direction. This is the second of four July work sessions.

The Draft Program EIR for the *Plan Santa Barbara* General Plan Update evaluates environmental effects of projected citywide growth to the year 2030 under the proposed General Plan policy amendments. Mitigation measures are identified to reduce significant impacts. Comparative impact analysis is provided for alternative growth scenarios and policy sets, including the "No Project" Alternative (retain existing policies); the Lower Growth Alternative, and the Additional Housing Alternative. The Draft EIR identifies significant impacts associated with traffic and climate change even with identified mitigation, and identifies potentially significant impacts that could be mitigated in the areas of air quality; biological resources; geological conditions; hazardous materials; heritage resources; hydrology/flooding; and solid waste management.

Staff presentations at the Council EIR work session will cover (1) the environmental review requirements of the California Environmental Quality Act (CEQA); (2) the roles of the Planning Commission and Council in the environmental review process and the required findings for the EIR; (3) a review of the climate change discussion and analysis in the EIR; (4) the EIR process and schedule; and (5) a summary of the EIR impact analysis. Public comment on this agenda item will be received at the end of the Council work session.

Attachments to this report provide summary information, including (1) Background on Program EIR for General Plan Update; (2) Summary of Environmental Impacts; and (3) Summary of Alternatives Analysis (Key Issues).

**SUSTAINABILITY IMPACT:**

The Program EIR for the General Plan Update contains analysis pertaining to environmental sustainability issues including energy consumption, waste management, water supply, open space, creeks, biological habitats, pollution, and hazards.

**ATTACHMENT(S):**

1. Background on Program EIR for General Plan Update
2. Summary of Environmental Impacts from DEIR
3. Summary of Alternatives Analysis (Key Issues)

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**SUBMITTED BY:** Paul Casey, Assistant City Administrator, Community Development

**APPROVED BY:** City Administrator's Office

# **Attachment 1**

## ***Plan Santa Barbara General Plan Update***

### **Background: Program EIR for General Plan Update**

#### **California Environmental Quality Act (CEQA)**

Under California Environmental Quality Act (CEQA) provisions, the *Plan Santa Barbara* General Plan Update is subject to environmental review prior to its approval. The Environmental Impact Report (EIR) is an informational document to allow the public and decision-makers to consider the environmental consequences of proposed actions, along with measures that could feasibly avoid significant environmental effects.

#### **Project Analyzed in EIR**

The draft Program EIR evaluates forecasted future growth in the City to the year 2030 under the proposed *Plan Santa Barbara* General Plan policy amendments to identify potential citywide effects on the physical environment. The Draft *Policy Preferences Report* initiated for environmental review by City Council (January 2009) provided the EIR project description. The EIR analysis of *Plan Santa Barbara* assumed development of up to an additional 2,800 residential units, and up two million additional square feet of commercial and other non-residential development within the City by 2030.

#### **EIR Scope of Analysis**

The EIR provides a full scope of analysis at a General Plan level of specificity, including potential impacts associated with environmental resources (air quality, biological resources, heritage resources, open space and visual resources, water quality, etc.), environmental hazards (geologic/seismic, flooding, wildfire, noise, etc.), public facilities and services (water supply, wastewater, solid waste, fire, police, schools, parks, etc.), and transportation (traffic and circulation), as well as growth-inducing effects (population and jobs/housing balance) and climate change issues.

In general, the EIR recognizes that additional growth occurring incrementally citywide over the next two decades has the cumulative potential for significant impacts by 2030. In many instances existing City policies and programs and proposed General Plan Update policy amendments would reduce these potential environmental effects as individual projects occur.

#### **Impact Classifications**

The EIR identifies impacts of the Plan according to the following classifications: Class 1 Impacts – Significant Impacts (even after applying Mitigation Measures); Class 2 Impacts – Potentially Significant Impacts that can be reduced to Less than Significant levels with Mitigation Measures; Class 3 Impacts – Less than Significant Impacts.

The EIR also provides analysis of the regional effects of City impacts together with similar impacts in adjacent jurisdictions on the South Coast. Longer-range City impacts in the year 2050 and beyond are also discussed.

### **Mitigation Measures**

The EIR identifies Mitigation Measures that have the potential to reduce potentially significant impacts to less than significant levels. The mitigation measures identified in the EIR include additional policies and programs that could be included in the General Plan. Under CEQA, if an EIR identifies significant environmental effects of the project, mitigation measures are required to be implemented if decision-makers confirm that they are feasible. A determination of feasibility or infeasibility may consider economic, environmental, legal, social, and technological factors.

For impacts identified as less than significant (Class 3), the EIR also identifies additional Recommended Measures (RMs) which can be considered for addition to the General Plan to further benefit the environment.

### **Alternatives to the Project**

The DEIR provides a comparative impact analysis for alternative policy and growth scenarios. The Alternatives were identified to reflect the range of community opinion about General Plan policies and the amount and location of future growth.

The *Lower Growth Alternative* evaluates the comparative impacts of a policy set more limiting of growth than the *Plan Santa Barbara* policies, toward further protection of community character and resources. Associated growth assumptions analyzed are up to 2,000 additional residential units and up to one million square feet of additional non-residential development.

The *Additional Housing Alternative* evaluates the comparative impacts of a policy set that promotes additional affordable housing, toward further improving the jobs/housing balance to reduce traffic and energy consumption and greenhouse gas production, and toward maintaining population and economic diversity. Growth assumptions analyzed with this policy set are up to 4,360 additional residential units and up to one million square feet additional non-residential growth.

The *"No Project"/ Existing Policies Alternative* required by CEQA evaluates the comparative impacts if the *Plan Santa Barbara* policy amendments did not proceed and the existing General Plan policies continued into the future. The associated growth assumptions analyzed are up to 2,800 additional housing units, and up to 2.2 million square feet additional non-residential development.

### **Final EIR Certification**

The proposed Final EIR is currently being prepared, including written responses to comments from agencies, groups, individuals, and City entities received during the public review period for the Draft EIR (March 18 – May 17, 2010), and associated text changes.

When complete, the Final EIR will be presented to the Planning Commission for certification. The certified Final EIR will be presented to City Council for information as part of its consideration of action to adopt the Plan. When the City Council adopts the Plan, the City Council will be required to make certain findings regarding the EIR and

will be required to adopt a statement of Overriding Considerations regarding the significant environmental effects related to the Plan (transportation and climate change).

The State CEQA Guidelines (§15151) provide the following guidance for the standards for adequacy of an EIR:

*“An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure.”*

### **CEQA Findings with Project Approval**

As with all General Plans, final approval of the General Plan Update is expected to necessitate choosing a balance among sometimes competing policy objectives. It is likewise expected that there may continue to be differences of opinion in the public and among decision-makers as to the best balance among objectives.

This issue is also noted in the State CEQA Guidelines (§ 15021 *Duty to Minimize Environmental Damage and Balance Competing Public Objectives*):

- “(a) CEQA establishes a duty for public agencies to avoid or minimize environmental damage where feasible.*
  - (1) In regulating public or private activities, agencies are required to give major consideration to preventing environmental damage.*
  - (2) A public agency should not approve a project as proposed if there are feasible alternatives or mitigation measures available that would substantially lessen any significant effects that the project would have on the environment.*
- “(b) In deciding whether changes in a project are feasible, an agency may consider specific economic, environmental, legal, social, and technological factors.*
- “(c) The duty to prevent or minimize environmental damage is implemented through the findings required by Section 15091.*
- “(d) CEQA recognizes that in determining whether and how a project should be approved, a public agency has an obligation to balance a variety of public objectives, including economic, environmental, and social factors, and in particular the goal of providing a decent home and satisfying living environment for every Californian. An agency shall prepare a statement of overriding considerations as described in Section 15093 to reflect the ultimate balancing of competing public objectives when the agency decides to approve a project that will cause one or more significant effects on the environment.”*

## Attachment 2

### ***Plan Santa Barbara General Plan Update*** **Summary of Environmental Impacts from DEIR Analysis**

The Draft EIR (March 2010) analysis identified the following environmental impacts associated with anticipated development to the year 2030 under draft *Plan Santa Barbara* General Plan policy amendments. Required mitigation measures (MMs) are identified to reduce potentially significant impacts. Recommended measures (RMs) are identified to further address potential impacts and benefit the environment.

<b>CLASS I</b> <b>Significant Impacts</b> ( <i>Citywide 2030</i> )	<b>Required Mitigation Measures</b>
<b>Transportation</b> Increased peak-hour traffic congestion  <i>[Current 13 impacted intersections could potentially increase to 21 impacted intersections; increase in vehicle miles traveled (VMT). Identified mitigation could substantially reduce impact]</i>	MM T-1 –Roadway and signal improvements MM T-2 – Measures to reduce peak-hour vehicle trips and increase alternative travel mode use through modified parking requirements, parking pricing, and transportation demand management (TDM) measures.
<b>Global Climate Change</b> Increased greenhouse gases emissions from transportation fuel and buildings  <i>[From existing 1.3 million tons/year GHG emissions citywide to 157 million tons/year. Identified mitigation could substantially reduce impact.]</i>	MM T-2 -Reduce vehicle trips and miles traveled and associated greenhouse gas generation  <i>RM C-1 policies for carbon sequestration through tree planting/ revegetation;</i> <i>RM C-2 work with regional partners toward methane capture/ fuel cell development at Tajiguas Landfill;</i> <i>RM C-3 continue programs to retrofit municipal systems with energy efficient equipment;</i> <i>RM C-4 policies for additional renewable energy sources for City operations including wind turbines, solar facilities, and monitor ocean power projects; and</i> <i>RM C-5 additional policy to establish goal of 30 MW new solar energy in City by 2030.)</i>
<b>CLASS 2</b> <b>Less Than Significant Impacts with Mitigation</b> ( <i>Citywide in 2030</i> )	<b>Required Mitigation Measures</b>
<b>Air Quality</b> Potential health risks to residential uses along Highway from diesel particulate emissions	MM AQ-1 – Interim 250-foot setback from Highway 101 for new residential uses until State regulations are implemented and diesel particulates are reduced; install additional vegetation along Highway 101.
<b>Biological Resources</b> Gradual loss of upland and creek/riparian habitats and species.	MM B-1 – Further protect key upland habitat/ corridors MM B-2 – Creek channel naturalization; drainage restoration; riparian habitat restoration; creek setback standards.  <i>(Recommended measures RM B-1 oak woodland protection and RM B-2 riparian woodland protection)</i>

<b>CLASS 2 - Less Than Significant Impacts with Mitigation</b> ( <i>Citywide in 2030</i> ) (Continued)	<b>Required Mitigation Measures</b>
<b>Geological Conditions</b> Sea cliff retreat	MM G-1 – Updated bluff retreat review guidelines; shoreline management plan ( <i>Recommended measure RM G-1 to update Coastal Plan.</i> )
<b>Hazards</b> Adequacy of household hazardous materials collection facility capacity	MM Hz-2 – Agency coordination to establish additional collection facility capacity
<b>Heritage Resources</b> Effects of development on historic resources	MM Hr-1a – Protect historic resources during adjacent construction activities MM Hr-1b – Modified density and design policies for landmark and historic districts
<b>Hydrology and Water Quality</b> Increased flood hazards from climate change sea level rise (longer range impact to 2050)	MM Hydr-1a – Adaptive management for sea level rise
<b>Noise</b> Increased roadway noise levels along Highway 101 affecting existing residential uses	MM N-1 – Periodically monitor freeway noise levels along Highway 101. If traffic noise expands the 65 dBA contour along the freeway corridor, implement measures to reduce effects (e.g., structure retrofits, barriers, vegetation)
<b>Open Space/Visual Resources</b> Gradual loss of important open space areas	MM V-1 – Protect key open space areas; establish additional funding mechanisms; coordinate management with citizen groups, owners, institutions. V-2 – Coordinate on regional open space
<b>Public Utilities/ Solid Waste Management</b> Adequacy of long-term solid waste management facility capacity	MM PU-1a –Coordinate with agencies to establish additional long-term waste management capacity. MM PU-1.b – Increase diversion of solid waste from landfill disposal through programs to increase waste reduction, recycling, and reuse.

<b>CLASS 3</b> <b>Less Than Significant Impacts</b> ( 2030)	<b>Recommended Measures to Further Reduce Impacts</b>
<b>Air Quality</b>	
Projected population/emissions are consistent with adopted County Clean Air Plan	<i>RM AQ-1 – Programs to support electric vehicles and low-emission vehicles and equipment</i>
Short-term emissions during construction	<i>No additional measures beyond existing City policies and proposed Plan Santa Barbara measures</i>
Residential development location within the commercial core - impacts from mixed use	<i>No additional measures</i>
<b>Biological Resources</b>	
Development impact on creek water quality	<i>RM B-2 – Riparian habitat protection, and RM Hydr-1 for flood hazards further address water quality</i>
Impacts of future development on coastal habitats and species	<i>RM B-3 Coastal habitat restoration</i>
Impacts of development on urban forest and individual specimen trees	<i>RM B-4 urban tree protection</i>

<b>CLASS 3 Less Than Significant Impacts ( 2030) (Cont.)</b>	<b>Recommended Measures to Further Reduce Impacts</b>
<b>Geological Conditions</b>	
Seismic hazards ((fault rupture, groundshaking, liquefaction, tsunami)	<i>No additional measures identified</i>
Geologic and soil instability (slope failure, expansive soils, erosion, radon).	<i>No additional measures identified</i>
<b>Hazards</b>	
Accident risks associated with aircraft, transportation corridors, electromagnetic fields (EMF)	<i>Recommended measure RM Hz-1 to continue EMF prudent avoidance policy for development near transmission lines and monitor scientific study</i>
Hazardous materials associated with contaminated sites and commercial/ industrial facilities	<i>RM Hz-2 vapor barrier study for development near sites with past contamination</i>
Wildland fires, emergency response and adequacy of roads and water systems.	<i>RM Hz-3 water system improvements and private water supplies for fire fighting</i>
<b>Heritage Resources</b>	
Development effects on archaeological resources	<i>No additional measures identified</i>
Development effects on paleontological resources	<i>No additional measures identified</i>
<b>Hydrology and Water Quality</b>	
Development effects associated with flood hazards and storm water run-off effects	<i>No additional measures identified</i>
Effects on creek and groundwater quality	<i>Recommended measures RM Hydr-1 considerations for establishing creek setbacks</i>
Effects on coastal and marine water quality	<i>RM Hydr-2 measures to improve water quality at area beaches, including pharmaceutical waste education and collection, restoration measures for channels and habitat; and watershed action plans</i>
<b>Noise</b>	
Increased airport noise impacts	<i>No additional measures identified</i>
Noise guideline change	<i>No additional measures identified</i>
Noise effects from mixed use development	<i>Recommended measure RM N-1 to require more detailed noise assessments for propose special, conditional, and institutional uses that may create nuisance noise affecting residential neighborhoods.</i>
Construction noise effects	<i>No additional measures identified</i>
<b>Open Space and Visual Resources</b>	
Gradual loss of important scenic views of waterfront, hillsides, and in commercial core	<i>Recommended measure RM V-1 additional policies for protection of scenic views</i>
Gradual change to community visual character	<i>RM V-2 additional policies for protecting community character pertaining to design standards, design overlays, building size, bulk, and scale, form-based codes, development monitoring, and preserving community character</i>
Lighting and glare effects	<i>RV V-3 policies on open space night sky</i>



<b>CLASS 3 Less Than Significant Impacts ( 2030) (Cont.)</b>	<b>Recommended Measures to Further Reduce Impacts</b>
<b>Public Services</b>	
Police services	<i>No additional measures identified</i>
Fire protection services	<i>No additional measures identified</i>
Parks and recreation services	<i>Recommended measure RM PS-1 additional policies for provision of parks</i>
School services	<i>RM PS-2 additional policies language on schools as part of Sustainable Neighborhood Plans</i>
<b>Public Utilities</b>	
Water supply	<i>Recommended measure RM PU-1 measures for consideration as part of updating long-term water supply program</i>
Wastewater	<i>No additional measures identified</i>
Power and communications utilities	<i>No additional measures identified</i>
<b>Transportation</b>	
Reduced per capita vehicle commute trips from PlanSB policies and MMs (Class 4 beneficial impact)	<i>RM SE-2 policies to promote businesses that serve lower income and ethnic minority populations</i>

<b>ADDITIONAL ENVIRONMENTAL ANALYSIS</b>	
<b>Energy</b>	
Transportation fuel consumption	<i>Recommended measure RM E-1 fuel reduction objective and gas tax for reduction of trip generation and reduced fuel consumption</i>
Energy consumption in buildings	<i>RME-2 building green, solar, lighting, and heating measures, and community energy program to promote energy conservation</i>
<b>Global Climate Change</b>	
Greenhouse gas emissions from buildings	<i>Recommended measures identified under Climate Change and Energy items above</i>
<b>Jobs/Housing Balance</b>	
Job growth and housing availability	<i>Recommended measures RM P-1 additional policies addressing growth monitoring, growth pacing; job creation, regional coordination on affordable housing, City affordable housing locations, student/faculty housing, and incentives for affordable housing pertaining to streamlining of permitting process, and pursuing legislation to extend redevelopment funding</i>
<b>Socioeconomic Issues</b>	
Environmental hazards	<i>Recommended measures RM SE-1 interior noise reduction home improvement program</i>
Economic development and housing availability	<i>RM SE-2 policies to promote businesses that serve lower income and ethnic minority populations.</i>
Community resources and public services	<i>RM SE-2 policies to promote businesses that serve lower income and ethnic minority populations</i>
Participation in community planning	<i>No additional measures identified</i>

## Attachment 3

### ***Plan Santa Barbara General Plan Update*** **Summary of EIR Alternatives Analysis**

For No Project, Project, Lower Growth, and Additional Housing Alternatives

POLICY ASSUMPTIONS for EIR analysis	GROWTH ASSUMPTIONS* <i>Net Increase 2008-2030</i>	COMPARATIVE IMPACTS from DEIR analysis
<p><b><i>“No Project”/ Existing Policies Alternative</i></b> Existing policies and historic growth rate assumed to continue.</p> <ul style="list-style-type: none"> <li>• GP land use/zoning designations</li> <li>• Non-residential growth cap and findings</li> <li>• Pyramid range of uses in commercial; R-3/R-4 stds</li> <li>• Building heights of 30, 45, and 60 feet in commercial</li> <li>• Mixed use incentives; variable density; R-2 density</li> <li>• State/City bonus density, inclusionary affordable housing provisions; current 2<sup>nd</sup> unit policies</li> <li>• Current design review standards.</li> </ul>	<p>Non-Residential <b>2.3 million SF</b> <i>(Square Feet)</i></p> <p>Residential <b>2,800 DU</b> <i>(Dwelling Units)</i></p>	<p><b>Traffic: Significant</b> Greatest potential impact, 14 additional intersections, 38% increase vehicle miles traveled (VMT); &gt;11,000 added trips South of Hot Springs</p> <p><b>Climate: Significant</b> Greatest potential impact; 1.6 mill. tons/year greenhouse gases (GHG); 16.5 tons/capita</p> <p><b>Other Impacts: Mitigable</b> Greatest potential effects on local community resources and regional issues, but mitigable to less than significant levels. Worsens jobs/housing balance (2.04 jobs/unit).</p>
<p><b><i>Project - Plan Santa Barbara General Plan Update</i></b> Balance policies to protect character/resources and policies for more affordable housing (for traffic management, jobs/housing balance; economic/population diversity, energy climate change)</p> <ul style="list-style-type: none"> <li>• Reconfirm Living Within Our Resources; protect and enhance community character, historic resources, established neighborhoods</li> <li>• Continue to limit non-residential growth; direct development to commercial core areas</li> <li>• Priority for affordable housing and Community Benefit land uses; Sustainable Neighborhood Plans</li> <li>• Mixed use, setback, open space, landscaping standards, Floor Area Ratios, Form Based Codes, lower heights next to residential and historic structures for compatible building sizes</li> <li>• Reduced unit size; variable density amendments; higher density incentives for affordable, rental, ‘affordable by design’ housing; 2<sup>nd</sup> unit incentives</li> <li>• Reduced parking standards for commercial core; moderate TDM expansion.</li> </ul>	<p>Non-Residential <b>2.0 million SF</b></p> <p>Residential <b>2,800 DU</b></p>	<p><b>Traffic: Significant</b> <i>Potential</i> impact 8 additional intersections, 36% VMT increase; 11,000 added trips So. of Hot Springs. Impact substantially avoided with transportation demand management (TDM) expansion.</p> <p><b>Climate: Significant</b> Estimated 1.62 million tons/year GHG; 16.2 tons per capita, not meeting State directive to reduce GHG to 1990 levels.</p> <p><b>Other Impacts: Mitigable</b> Potentially significant impacts (resources, hazards, and public facilities) mitigable to less than significant levels (air quality, biological resources, geology, hazards, hydrology, noise, open space, and solid waste). Job/housing approx balance (1.44 jobs/unit).</p>

### Summary of EIR Alternatives Analysis (continued)

Policy Assumptions for EIR analysis	Growth Assumptions* <i>Net Increase 2008-2030</i>	Comparative Impacts from DEIR analysis
<p><b><i>Lower Growth Alternative</i></b></p> <p>More growth limitation policies to protect community character, historic resources, neighborhoods, environmental resources, services, costs (e.g. water supply), and support tourism.</p> <ul style="list-style-type: none"> <li>• Further reduce nonresidential SF cap</li> <li>• Lower building height limits to 40-45 feet</li> <li>• Added protection for historic districts</li> <li>• Retain current density designations; reduce average unit size provisions</li> <li>• Increase setbacks, open space, landscaping requirements.</li> <li>• Retain 2<sup>nd</sup> unit restrictions</li> <li>• Retain or increase parking standards.</li> </ul>	<p>Non-Residential <b>1.0 million SF</b></p> <p>Residential <b>2,000 DU</b></p>	<p><b>Traffic: Significant</b> Potential impact less, 7 additional intersections, 28% increase vehicle miles traveled (VMT); ~9,000 added trips South of Hot Springs. No mitigation identified (e.g., TDM), because not consistent with policies.</p> <p><b>Climate: Significant</b> Slightly better 1.58 mill. tons/year greenhouse gases (GHG).</p> <p><b>Other Impacts: Mitigable</b> Reduced potential impacts to local community resources and also mitigable to less than significant levels. Jobs/housing balance improved (0.90 jobs/unit)</p>
<p><b><i>Additional Housing Alternative</i></b></p> <p>More affordable housing policies to further address traffic management, jobs/housing balance, economic vibrancy, population diversity, energy and climate change.</p> <ul style="list-style-type: none"> <li>• Promote compact growth along transit corridors</li> <li>• Increased affordable housing incentives; increased density; reduce unit sizes; retain or increase building heights; allow 2<sup>nd</sup> units in more areas; reduce parking standards; streamline housing permit processes.</li> <li>• Strong expansion of Transportation Demand Management (TDM) measures and support infrastructure for alternative modes</li> </ul>	<p>Non-Residential <b>1.0 million SF</b></p> <p>Residential <b>4,360 DU</b></p>	<p><b>Traffic: Significant</b> Lowest potential impact 2 additional intersections, 11% VMT increase; 5,100 added trips So. of Hot Springs.</p> <p><b>Climate: Significant</b> Lower impact - estimated 1.4 million tons/year GHG; 13.7 tons per capita.</p> <p><b>Other Impacts: Mitigable</b> Potentially significant impacts (resources, hazards, and public facilities) mitigable to less than significant levels. Job/housing substantially better (0.41 jobs/unit).</p>

\*Assumptions in table reflect net additional development within City boundaries. Additional development assumed within City Sphere of Influence during 2008-2030: Residential: 403 dwelling units; Non-Residential: 178,202 sq. feet.